
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. :

MARY ANN PETERSON and :
JOHN T. PETERSON Case No. 06-8077

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my personal knowledge and belief. Between in or about April 2005 and in or about January 2006, in the County of Sussex, in the District of New Jersey, and elsewhere, defendants MARY ANN PETERSON and JOHN T. PETERSON, did

knowingly and wilfully conspire to embezzle, steal, purloin, and
covert to their own use and the use of another, and without authority,
sell, convey, and dispose of things of value of the United States
having a value of approximately \$50,231,

contrary to Title 18, United States Code, Section 641, in violation of Title 18, United States Code, Section 371.

I further state that I am a Special Agent for the Department of Defense and that this complaint is based on the following facts:

SEE ATTACHMENT A

ZACHARY HATCHER
Special Agent
Defense Criminal Investigative Service

Sworn to before me and subscribed in my
presence, on this 5th day of May, 2006
in Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, ZACHARY HATCHER, am a Special Agent with the Defense Criminal Investigative Service, having conducted an investigation and having spoken with other individuals, have knowledge of the following facts from my own investigation and from speaking with other law enforcement officers:

1. From at least in or about April 2005 through in or about January 2006, defendant MARY ANN PETERSON was employed as a Building Manager for Quality Engineering and Systems/Assurance at Picatinny Arsenal, New Jersey.
2. As part of her duties, defendant MARY ANN PETERSON was authorized to purchase, with a government-issued credit card, office-related supplies for use in the building in which she worked. In connection with these authorized purchases, MARY ANN PETERSON prepared pre-purchase approvals, that is, purchase orders which required approval by MARY ANN PETERSON'S supervisor. Defendant JOHN T. PETERSON, the son of MARY ANN PETERSON, was not authorized to use her government-issued credit card.
3. From in or about April 2005 through in or about January 2006, defendants MARY ANN PETERSON and JOHN T. PETERSON purchased miscellaneous unauthorized items, including but not limited to, computer equipment, digital cameras, police equipment, cellular telephones, and thousands of dollars worth of gift cards for their personal use. The investigation reveals that in an effort to conceal the unauthorized purchases, MARY ANN PETERSON either did not create purchase orders, or created false purchase orders subsequent to the unauthorized purchases.
4. On or about December 15, 2005, law enforcement officers in Jefferson Township, New Jersey, arrested defendant JOHN T. PETERSON in connection with outstanding warrants. As the officers were effecting the arrest, they observed full-length police emergency light bars secured to the front windshield and rear window of the vehicle he was driving. The officers also observed a light and siren control box and a police duty belt containing handcuffs and pepper spray in the vehicle, that is, a red, 2005 Ford Mustang bearing license plate number, SPT-76J. The investigation reveals that the aforementioned police equipment was purchased with defendant MARY ANN PETERSON's government-issued credit card and shipped to defendant JOHN T. PETERSON at the home he shared with his mother, MARY ANN PETERSON.
5. A search of the vehicle revealed approximately \$6250 worth of gift cards, receipts for various items purchased in the amount of \$3400, two laptop computers and a GPS navigational system. During the course of the search, law enforcement officers observed a U.S. Department of Defense vehicle decal #CFL758 affixed to the front windshield. The investigation reveals that the decal was registered to defendant MARY ANN PETERSON, in her official capacity as a U.S. government employee at Picatinny Arsenal, for a 1996 Chevrolet Blazer bearing license plate number, SMZ-11D.
6. On or about January 9, 2006, U.S. Army investigators interviewed defendant MARY ANN

PETERSON regarding the misuse of her government-issued credit card. Defendant MARY ANN PETERSON admitted, in substance and in part, that she reserved and/or paid for a rental car for a four to five month period with her government-issued credit card. She stated further that the rental car was for her personal use. The rental car was the same vehicle that is, a red, Ford Mustang bearing license plate number, SPT-76J, in which JOHN T. PETERSON was arrested on or about December 15, 2005.

7. The investigation reveals that defendants MARY ANN PETERSON and JOHN T. PETERSON charged approximately \$50,231 worth of personal items with MARY ANN PETERSON's government-issued credit card.